

**U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION REPORT (POLREP)**

Date: December 28, 1998
Subject: Rogers Fibre Mill Superfund Site
From: OSC Janis Tsang, US EPA, Region I
To: Attached List
POLREP No.: 2
Site ID No.: 5Z
Contract #/D.O. #: 68-S3-2001/2001-02-164
68-R1-9801/0003
Response Authority: CERCLA
NPL Status: non-NPL
State Notification: ME DEP notified
Cause of Release: Improper Storage of Drums/Tanks/Containers
Mobilization Date: July 1, 1998

Superfund Records Center
SITE: Rogers Fibre Mill
BREAK: 2.4
OTHER: 668340

Site Information

See POLREP #1.

Response Information

I. Situation :

Since the last POLREP, EPA has completed the demolition of the superstructure (wood, brick and masonry structure) of the mill complex, the water tower and the smokestack. EPA disposed of asbestos-containing roofing debris and non-hazardous oily boiler room debris at an offsite disposal facility. EPA sampled miscellaneous debris, soil, sediment, wooden building materials, hydraulic oil, dye, tanks and digesters. The sampling results revealed additional contamination located on the island and in the river sediment located in the previous collapsed section of building #1. Subsequently, OSC Tsang amended the action memorandum to increase the project ceiling to \$1,995,000 to address the additional contamination. The Action Memorandum Addendum was approved by the Deputy Director on October 15, 1998.

II. Removal Actions Taken To-date:

- An asbestos survey was conducted by Environmental Management Inc., a subcontractor to IT Corporation (formerly OHM). Subsequent to the survey, the following ACM were found and abated prior to the demolition:
 - approx. thirty-two (32) cubic feet of red felt paper
 - gasket materials in the boiler room
 - panels in boiler room
 - approx. five (5) linear feet of boiler insulation
 - inside felt paper in the metal building
 - pipe insulation in the collapsed area of building #3



- gasket material in the tumbler room
 - 144 square feet of bathroom floor pad in the tumbler room
 - 600 square feet of shower stalls and ceiling transite board in the tumbler room area
 - Twenty (20) square feet of transite panels in building #1
 - flange gasket in the basement of building #1
 - Six (6) linear feet of elbow pipe insulation in building #3
- The family resided in the single house on-site was relocated prior to the commencement of the demolition.
 - EPA/START sampled the following: miscellaneous debris, soil, sediment, wood building materials, hydraulic oil, dye, and digesters.
 - Three (3) grab soil samples were collected from the island for PCB/Pesticide, SVOC and metals analyses.
 - Eighteen (18) 55-gallon drums of oily debris was shoveled from the turbine room.
 - Seven (7) 55-gallon drums of heavy-metal contaminated oily debris were removed from the support column and around the outside of the digesters. This oily debris was found to contain up to 22,600 ppm total lead and 8.79 mg/l TCLP lead.
 - There were approximately eleven (11) tanks in various sizes found in the basement. These tanks are made from concrete, wood, and steel materials. Three (3) of which are made of floor-to-ceiling construction. All tanks appear to be containing anywhere from six (6) inches to forty-eight (48) inches of materials. EPA has collected additional samples from these tanks for on site screening for PAH utilizing immunoassay screening method and metals utilizing X-ray Fluorescence (XRF). Samples were also sent to laboratories for confirmatory analyses. Screening sampling results found that some of the tanks are contaminated with up to 18,374 ppm total chromium, 7,945 ppm copper, 1,275 ppm lead and 3,825.95 ppm zinc. A sample taken from one of the tanks found approximately 95 ppm of 3,3'- Dichlorobenzidine. Elevated level of radiation was detected in one of the tanks. A sample was sent to the EPA National Air and Radiation Environmental Laboratory in Montgomery, AL. OSC Tsang requested James Cherniack, EPA Radiation Specialist for assistance to evaluate the radiation condition.
 - The following wastes were sent to the Turnkey Landfill in NH for disposal:
 - i) an approximate total of forty-five (45) cubic yards of asbestos-containing roofing debris;
 - ii) an estimated total of thirty (30) cubic yards of non-hazardous oily boiler room debris were transported to Turnkey Landfill, NH for disposal; and,
 - iii) an estimated total of 4,890 lbs of friable asbestos previously found in the basement during the preliminary assessment/site investigation (PA/SI).

- Roofing debris found on the island adjacent to the mill contained up to 80 percent asbestos. Because the ACM is partially buried in the island, EPA cannot estimate the quantity of ACM on the island until after the completion of the phase II demolition.
- One of three surface soil samples taken from the "island" in an area with stained soil, contained up to 1,446.3 ppm total polynuclear aromatic hydrocarbons (PAHs). EPA cannot estimate the volume and extent of contamination on the island until heavy equipment can be brought onto the island to conduct further assessment.
- Chunks of metal slag, disposed of on the island contain up to 8,630 ppm total lead (115 ppm TCLP lead), 17,900 ppm copper (120 ppm TCLP copper), 3,280 ppm total zinc (24.4 ppm TCLP zinc). EPA cannot estimate the volume of contamination on the island until heavy equipment can be brought onto the island to conduct further assessment.
- Debris found in the basement of the mill building contained up to 1,130 mg/kg total chromium (7.2 mg/l TCLP chromium).
- Dry red dye materials and miscellaneous dye-colored stained soil/sediment were observed in various locations of the collapsed areas of the main mill building and the island. These unknown red dye materials broke through the level C personal protective equipment (PPE) during sampling causing irritation to the on-site workers. As a result, workers are required to don level B PPE should red-dye materials be disturbed in these locations. Also, water turned red in the area between the east wall and the "new" wall (by Depot Street) of the main mill building (building #1) when twelve-inch sediment samples were collected. EPA excavated to a depth of 8 feet below the basement surface (approximately 18 feet below ground elevation) and uncovered large quantity of buried wood and miscellaneous debris in the area. Elevated level of methane gas was detected by Flame Ionization Detector (FID).
- On September 28, 1998, a dam inspection and a meeting were held to identify/define structural boundary of the foundation as a dam. In attendance were OSC Tsang, START, CMP, Parson Chemical and Energy Group (Consultant to CMP), Weston and IT Engineers. The structural boundary of the dam was marked during the inspection. Subsequent to the meeting/inspection, EPA proceeded with planning the demolition of the non dam mill foundation and final site restoration activities.
- EPA held discussions with Lydall Eastern, Inc., one of the named PRPs regarding taking over work at the site under an administrative order. On October 1, 1998, EPA provided Lydall a pre-release draft of the Draft Administrative Order and Scope of Work. Subsequently, EPA and Lydall met on October 8, 1998 to discuss Lydall's potential work at the site. OSC Tsang met with Lydall's consultant, Haley and Aldrich, to review the current site activities and provided them with data. After continued discussions with Lydall regarding the company's liability for the site cleanup and its ability to mobilize in time to carry out site work during the remaining 1998 construction season, Lydall verbally declined the opportunity to take over the removal action on October 26, 1998.

- On October 19, 1998, Jerry Cross of the Federal Energy Regulatory Commission (FERC) conducted an inspection on the mill dam. At the end of the inspection, Mr. Cross also met with OSC Tsang and engineers from CMP and Weston to discuss his observations during the inspection and his recommendations regarding the boundary of the dam delineated by the CMP consultant during the September 28, 1998 meeting/inspection.
- On October 28, 1998, FERC sent a letter to CMP indicating FERC's concurrence with the technical recommendations made by the CMP's consultant. In the letter, FERC directed CMP to prepare an inspection and maintenance plan that will assure the continued structural integrity of the mill dam. FERC also required CMP to conduct annual inspection, as well as an initial period of time when frequent inspections of the mill dam site.
- On November 5, 1998, OSC Tsang consulted with members of the EPA Regional Ecological Risk Assessment Team (RERAT) and EPA/ERT regarding the metal and PAHs cleanup levels in the sediment. RERAT and ERT recommended the ecotoxicologically-based cleanup level in parentheses for each contaminant as follows: PAH (4 ppm), nickel (20 ppm), chromium (81 ppm), copper (34 ppm), and lead (47 ppm). OSC Tsang conducted a conference call with personnel of U.S. Fish and Wildlife Services (US F&WS) to inform them of the upcoming sediment excavation, de-watering and water treatment operations. OSC Tsang also consulted with US F&WS for their advice of the trust resources that are in the vicinity of the cleanup. OSC Tsang discussed the cleanup levels recommended by RERAT/ERT with US F&WS and indicated to them that the removal program will attempt to achieve the recommended cleanup levels in sediment to the extent practicable both technically and economically. Should EPA not be able to achieve the recommended cleanup levels for these contaminants, EPA may conduct an ecologically risk assessment on the residual contamination in sediment at that point.
- A de-watering operation along with a water treatment system has been set up to facilitate the excavation of the river sediment. The de-watering operation includes a surface drainage system which routes water to a temporary sump where water is pumped to an equilization tank and to water treatment system via three-inch submersible pumps. The temporary sump constructed with perforated corrugated metal pipe is located in the lowest area near the excavation to allow water to drain into the sump. The water treatment system is composed of two 50-micron twin bag-filter units arranged in parallel and two activated carbon filtration units. Manifolds are installed to allow bag replacement without interrupting the treatment. The treated water is discharged into the tail race. ME DEP and SRCC were informed in writing of the operations.
- The screening and laboratory analytical data indicated that the debris/soil/sediment is contaminated with elevated levels of metals and polynuclear aromatic hydrocarbons (PAHs) and is considered to be aquatic toxic to the river organism and therefore, is required to be removed/excavated. However, this contaminated debris/soil/sediment is not considered to be RCRA characteristic waste and can be disposed of as non-hazardous waste. Nonetheless, EPA was not able to get approval acceptance of the waste to a non-hazardous landfill because these wastes are considered to be "special waste" under the State Regulation and landfills which are permitted to take this waste required the

generators perform frequent sampling. In light of the urgency of completing the excavation prior to winter demobilization, disposal arrangement with a hazardous landfill was made to allow the cleanup to continue. To-date, approximately 1,000 cubic yards of soil/sediment/debris have been stockpiled of which approximately 700 tons were shipped to Stablex in Canada via General Chemical in Framingham, MA. OSC Tsang met with ME DEP regarding the possibility of obtaining a permit variance for the testing requirements and discussed with the disposal facility. OSC Tsang will continue to work with both parties for a solution.

- A site stabilization/restoration design plan was completed by professional engineers at Weston-Manchester Office.
- OSC Tsang attended the weekly Selectmen's meeting to provide an update to town officials and citizens.
- OSC Tsang attended the monthly SRCC meeting to provide an update.
- Two newsletters were published in the months of August and November.

III. Future Plans:

- Complete the soil/sediment/debris excavation.
- Complete site stabilization activities in building #2 and forbay areas.
- Commence tank cleaning/decontamination.
- Commence phase II non dam mill foundation demolition, weather permitting.
- Continue to coordinate with ME DEP, CMP, SRCC and the town officials to complete the cleanup.

IV. Cost Information¹: As of November 28, 1998

	Amended Ceiling	Estimated Expenditure	Balance
ERCS:	\$ 1,250,000	\$ 870,000	\$ 380,000
START:	150,000	114,000	36,000
EPA:	110,000	95,400	14,600
EPA/ERT:	100,000	80,000	20,000
ACOE:	50,000	15,000	35,000
CONTINGENCY:	335,000	-0-	335,000
TOTAL:	\$1,995,000	\$ 1,174,400	\$820,600

CASE PENDING

¹The above costs do not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.